

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**LOYALTY CONVERSION SYSTEMS
CORPORATION,**

Plaintiff,

V.

AMERICAN AIRLINES, INC.

Defendant.

**LOYALTY CONVERSION SYSTEMS
CORPORATION,**

Plaintiff,

V.

JETBLUE AIRWAYS CORPORATION,

Defendant.

[illegible]

**Civil Action No. 2:13-cv-00655
(LEAD CASE)**

Jury Trial Demanded

Civil Action No. 2:13-cv-00662

Jury Trial Demanded

**PLAINTIFF’S RESPONSE TO DEFENDANT
JETBLUE AIRWAYS CORPORATION’S COUNTERCLAIMS**

Plaintiff Loyalty Conversion Systems Corporation (“Plaintiff” or “Loyalty Conversion”), by and through its attorneys, files the following Response to Defendant JetBlue Airways Corporation’s (“Defendant” or “JetBlue”) Answer, Affirmative Defenses, and Counterclaims to Loyalty Conversion’s Original Complaint (“the Counterclaims”), as follows:

PLAINTIFF'S RESPONSE TO COUNTERCLAIMS

JURISDICTION

1. Admitted.
2. Admitted.
3. Admitted.

PARTIES

4. Upon information and belief, admitted.
5. Admitted.
6. Admitted.

BACKGROUND

7. Admitted.
8. Admitted.
9. Admitted.

COUNTERCLAIM 1: DECLARATION OF PATENT INVALIDITY

10. No new factual allegations are included in this paragraph.
11. Denied.
12. Admitted JetBlue seeks such a declaration; denied that such a declaration is meritorious.

COUNTERCLAIM 2: DECLARATION OF NON-INFRINGEMENT

13. No new factual allegations are included in this paragraph.
14. Admitted.
15. Denied.
16. Admitted that JetBlue seeks such a declaration; denied that such a declaration is meritorious.

DEMAND FOR JURY TRIAL

17. Admitted.

ANSWER TO JETBLUE'S PRAYER FOR RELIEF

Plaintiff denies that JetBlue is entitled to any of the relief requested in its Counterclaims.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Loyalty Conversion Systems Corporation, requests that Defendant, JetBlue, take nothing against Plaintiff by reason of its Counterclaims against Plaintiff, that Plaintiff be awarded the relief sought in its Complaint, that the Court dismiss Defendant's Counterclaims against Plaintiff in their entirety with prejudice, that Plaintiff be awarded its costs of suit, including attorneys' fees, and that the Court grant such other and further relief as it deems just and proper.

Dated: October 3, 2014

By: /s/ Jay D. Ellwanger
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CERTIFICATE OF SERVICE

The undersigned certifies that on this 3rd day of October, 2013, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3).

/s/ Jay D. Ellwanger

Jay D. Ellwanger